

August 14, 2020

Honorable Judge LaShann DeArcy Hall
United States District Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East, Courtroom 4H North Brooklyn, NY 11201

Re: *Rosenshine v. A. Meshi Cosmetics Industries Ltd. et al*, Case # 1:18-cv-03572-LDH-LB

Dear Judge DeArcy Hall,

On March 30, 2020, you issued a Memorandum and Order on A. Meshi Cosmetics Industries Ltd.’s (“A. Meshi”) motion to dismiss our amended complaint. As part of the Memorandum and Order, our trade dress claim was dismissed as the complaint did not articulate the elements of Star Gel® design with specificity to be afforded trade dress protection, even though the elements were outlined in our opposition to A. Meshi’s motion to dismiss. We are therefore asking for permission to amend the complaint accordingly and include the Star Gel® design elements in the amended complaint.

We would also like to join the owners and managers of A. Meshi, Mr. Yermi Mizrahi, Mr. Shem Tov Mizrahi, and Ms. Nava Mizrahi, as defendants to this case, as they personally organize and direct the counterfeit Star Gel® operation, including sourcing all the raw materials in the supply chain to bring the counterfeit Star Gel® to market.

We therefore ask the Court for leave to file the attached amended complaint and proceed with the case.

Respectfully submitted,

Oren Rosenshine

Oren Rosenshine

Amir Rosenshine

Amir Rosenshine